

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**REPLY COMMENTS OF
PORTLAND COMMUNITY MEDIA, PORTLAND, OREGON**

Portland Community Media submits these reply comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming” and the opening comments filed in this proceeding.

Portland Community Media (PCM) is an Oregon nonprofit public benefit corporation, originally incorporated in 1981 as Portland Cable Access, which has provided for over 30 years, and continues to provide media and broadband technology training, tools and distribution platforms to diverse communities throughout the City of Portland to engage broad participation in civic and cultural life and to provide cable programming of, by and for the community over local public and governmental access cable channels.

One of PCM's primary roles is to offer low-cost, high-quality, specialized media training using existing and emerging technologies. We work with all aspects of the public; youth, adults, non-profits and community-based organizations to support the creation, production, post-production, promotion and scheduling of programming highlighting stories, news, public

meetings and culture. One of our biggest challenges is providing access and training for emerging technologies and digital platforms that utilize high definition signals to distribute content to our community. In spite of the funding constraints community members produced over 15,000 hours of *new*, local programs at PCM in the last year alone.

Although PCM has experienced stable capital funding to address demand in upgrading our equipment to professional standards, reductions and limits to operating revenue hinder our ability to deliver services with these assets to our community. Reductions in operating funds over time have led to limits in our ability to continue to deliver programs that address digital literacy and targeted technology training to marginalized populations, specifically homeless, people of color and people living in poverty. Each year we struggle to maintain current service levels when the demand of our community increases.

We now provide a multimedia lab and Internet services for individuals and groups that would otherwise not have access to these technologies. With the emergence of media mergers and technology convergence, PCM like other access centers across the country, continues to provide our community with a diverse, independent, local voice.

Our viewers tell us that they watch our channels because they are able to hear in-depth information about local issues that matter to them – information that is not available to them on broadcast channels. They watch PCM's CityNet 30 channel to watch gavel-to-gavel coverage of government meetings and municipal programs. *"The programs available on PCM channels are invaluable to me. On PCM channels I can hear the Mayor make a complete 10-minute speech on a topic I care about. Without PCM I would only hear 30-seconds of that speech as part of a 2-minute story on the news. PCM provides me with the ability to hear unbiased, complete information and I am able to come to my own conclusions."* Our community volunteers benefit

from our services, as well. Through learning technology and cultivating creative self-expression, community producers become more connected to their community. *“I attended my first workshop at PCM 5 years ago and have produced over 50 hours of locally focused programming for Public Access channels. My viewers rely on my program because I provide them with a viewpoint they cannot find elsewhere on local or national media.”*

PEG Channels are an irreplaceable and vital resource for our local community. Portland Community Media, like other community access centers across the country are community-based institutions that provide vital training and information services, increase the technological capacity for citizens, compliment local governments economic and career readiness efforts and provide a platform for information and cultural expression. In our community PCM provides a platform that is the foundation of a civil society in the modern age. If the Commission fails to prevent the industry practices at issue in the above mentioned petitions, we have little doubt that other operators might also adopt approaches that marginalize or effectively eliminate PEG access. We urge the FCC to support the on-going success of PEG by responding to the petition with a resounding “NO” to limiting or eliminating funding and support for PEG Access Centers nationwide.

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